



**State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-1370 FAX (603) 271-1381



October 18, 2002

Mr. Nathan Clinard  
Environmental Consultant  
Spaulding Composites Company  
One Monogram Place  
Rochester, New Hampshire 03866

**CERTIFIED MAIL (7099 3400 0003 0687 3797)  
RETURN-RECEIPT REQUESTED**

**LETTER OF DEFICIENCY  
ARD No. 2002-015**

**ADMINISTRATIVELY CLOSED**

Dear Mr. Clinard:

On June 13, 2001, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at Spaulding Composites Company ("Spaulding") in Rochester, NH. The purpose of the inspection was to determine Spaulding's compliance status with the NH Administrative Rules Env-A 100 *et seq.* and State Permits PO-B-1207, PO-BP-2773, and PO-BP-2774.

As a result of the inspection and subsequent file review, this Letter of Deficiency ("LOD") is being sent to identify the following deficiencies:

1. Env-A 608.10 requires the owner or operator of any stationary source or device that has been issued a state permit to operate to submit an application 90 days prior to the expiration of the state permit to operate. Spaulding was issued Permit PO-B-1207 on March 12, 1997. The Permit expired on August 31, 2001. DES received a permit application from Spaulding on June 18, 2001. The Permit was issued on January 3, 2002.
2. Condition IX Recordkeeping and Reporting of Permit PO-B-1207, and Condition XI Reporting Requirements of Permits PO-BP-2773 and PO-BP-2774, and Env-A 907.01 require the owner or operator of any stationary source or device subject to Env-A 600 to submit an annual emissions report, which includes the actual emissions of the device and the methods used in calculating such emissions in accordance, with Env-A 704.02. For calendar year 1999, the annual emissions report was required to be submitted on or before April 15, 2000. Spaulding submitted the annual emissions report for calendar year 2000 on September 11, 2001, but hasn't submitted the annual emissions report for calendar year 2001.
3. Env-A 1404.01(b) requires Spaulding to demonstrate compliance with Env-A 1400 following one of the methods specified in Env-A 1406.01. Further, Env-A 1400 requires that this information be retained on site and made available to DES upon inspection. At the time of the compliance inspection, Spaulding had not completed the compliance demonstration as required by Env-A 1404.01(b). Spaulding submitted this information to DES on August 11, 2002.

DES appreciates the steps that Spaulding has taken to address most of the deficiencies noted above and believes that the remaining deficiency can be resolved as follows:

4. Within 15 days of receipt of this LOD, submit to DES the annual emission reports required by Env-A 907.01 for calendar year 2001, which was due on April 15, 2002. The reports shall include the actual emissions of all combustion devices and process operations and the methods used in calculating such emissions in accordance with Env-A 903.02.

In addition to the above requested action, DES wants to remind Spaulding that it must comply with all of the conditions in the Permits, including maintaining all of the records listed in Condition VIII Recordkeeping and Reporting of Permit PO-B-1207, and Condition X Recordkeeping Requirements of Permits PO-BP-2773, and PO-BP-2774. DES also wants to remind Spaulding that payment for calendar year 2001 emissions is due by December 15, 2002.

In the event compliance is not achieved within the time period indicated, DES may initiate formal action against Spaulding including issuing an order requiring the deficiencies to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to Joseph Ritz, at the following address:

NHDES Air Resources Division  
Compliance Bureau  
6 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095

Please be advised that DES will continue to monitor Spaulding's compliance status and that this letter does not provide relief against any other existing or future violations. It is important that Spaulding be aware of all the requirements stipulated in its Permits. Please feel free to contact DES should you have any questions regarding compliance with the NH Code of Administrative Rules Env-A 100 *et seq.* and the requirements of the Permits. A current copy of the Air Resources Division rules can be obtained from the DES website at [www.des.state.nh.us/ard/ardrules.htm](http://www.des.state.nh.us/ard/ardrules.htm), or by contacting the Public Information Center at (603) 271-2975. If you have any questions regarding this matter, or require further information please contact Joseph Ritz at (603) 271-1391 or Mary Ruel at (603) 271-6795.

Sincerely,



Pamela G. Monroe  
Compliance Bureau Administrator  
Air Resources Division

PGM/jwr

cc G. Rule, DES Legal Unit  
R. Kurowski, EPA Region 1  
K. Ortmann, City Manager, City of Rochester  
AFS # 3301700031